

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

CONSUMER FINANCIAL PROTECTION  
BUREAU, *et al.*,

Plaintiffs,

v.

STRATFS, LLC (f/k/a STRATEGIC  
FINANCIAL SOLUTIONS, LLC), *et al.*,

Defendants, and

DANIEL BLUMKIN, *et al.*,

Relief Defendants.

24-CV-40 (EAW) (MJR)

**NOTICE OF NONPARTY FIDELIS LEGAL SUPPORT SERVICES,  
LLC'S MOTION CHALLENGING THE RECEIVER'S  
DETERMINATION THAT FIDELIS IS A  
RECEIVERSHIP DEFENDANT**

Nature of Action:	Enforcement of the Telemarketing and Consumer Fraud and Abuse Prevention Act and the Telemarketing Sales Rule.
Movant:	Nonparty Fidelis Legal Support Services, LLC.
Date and Time:	To be set by the Court.
Place:	Before Hon. Michael J. Roemer, United States Magistrate Judge, at the Robert H. Jackson United States Courthouse, 2 Niagara Square, Buffalo, New York 14202.
Supporting Papers:	Declaration of Timothy W. Hoover, dated March 4, 2024, with Exhibit A; Declaration of Cameron Christo, dated March 4, 2024, with Exhibits A-F; and memorandum of law, dated March 4, 2024.
Answering Papers:	The parties have agreed, and proposed to the Court, that the Receiver's answering papers be filed by March 7, 2024. The Court has not yet adopted that deadline or set a different one. If the Court does not set a deadline, answering papers are due by March 18, 2024.
Reply Papers:	Fidelis intends to reply. The parties have agreed, and proposed to the Court, that Fidelis's reply be filed by March 11, 2024. The Court has not yet adopted that deadline or set a different one. If the Court does not set a deadline, reply papers are due seven days after answering papers are filed.

Relief Requested: An order (i) declaring that the Receiver has no authority over Fidelis, either because he lacks jurisdiction or because Fidelis is not a Receivership Defendant; and (ii) awarding any other or additional relief that the Court deems appropriate.

Grounds for Relief: 28 U.S.C. §§ 754 and 1692; the Temporary Restraining Order issued on January 11, 2024; and the Court's inherent authority.

Oral Argument: Requested.

Dated: Buffalo, New York  
March 4, 2024

**HOOVER & DURLAND LLP**  
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